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ABSTRACT

Pressures facing higher education institutions regarding accountability and the implications of their responses for accreditation agencies and state governments are discussed. Much of the response of institutions to current or anticipated declines in enrollments or financial resources is defensive and/or negative. Some institutions plan against retrenchment by seeking political relief from the financial effects of actual or projected enrollment declines. There is also a growing willingness in higher education to adopt market-oriented, entrepreneurial behavior in an effort to maintain enrollment. If higher education pursues survival in appropriate ways, it may undermine its ability to respond to legitimate demands, thus leading to further loss of credibility and autonomy. Specific suggestions for planning for retrenchment are offered. One implication of legislative program auditing for higher education is that auditing beyond mere fiscal review is increasing. The states increasingly will assert both their perceived right and their ability to examine the efficiency and effectiveness of higher education programs and policies. A critical issue is what the reaction of higher education will be to: (1) the increasing pressure to neglect quality in the short term for the sake of survival; and (2) the outside pressure on the institution to assess performance in ways that seriously distort the essential purposes of higher education. It is suggested that independent or private accreditation is the logical means of implementing self-regulation. (SW)

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An Occasional Paper

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ACCOUNTABILITY IN HIGHER EDUCATION:

Forces, Counterforces, and the Role of Institutional Accreditation

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John W. Harris

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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THE COUNCIL ON POSTSECONDARY ACCREDITATION

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Preface

The accountability movement, particularly as reflected in the recent growth of legislative initiatives, is pressing traditional institutions of higher education to be more open about their purposes, practices, and standards. At the same time, societal factors such as stabilizing or declining enrollments are causing the academy to lower its standards, blur its purposes, and adopt entrepreneurial behaviors which tend to make quality secondary to survival. The result of these incompatible forces is the erosion of both autonomy and quality.

Accreditation generally, and regional accreditation in particular, historically has been the institutional defender of the academy's autonomy and the principal guarantor of its quality. Yet the ways of accreditation—its structural/process emphases, its private, associational, and collegial orientation—are under fundamental challenge by the emerging nontraditional institutions and by the encroachments of the language, methods, and implicit standards characteristic of the accountability movement.

If accreditation, particularly regional accreditation, is to retain its historic role as a guarantor of quality and its equitable position in the partnership between the federal, state, and private sectors—the so-called triad—it must assess educational quality directly in terms of student achievements and the meaning of degrees. Put differently, if accreditation is going to assist in maintaining the functional separateness between the academic and political communities, the academy must regulate itself through sensitive, educational criticism. Independent or private accreditation is the logical means of implementing self-regulation of this sort.

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CONTEMPORARY PRESSURES ON INSTITUTIONS

In the late 1960's and early 1970's pressures for greater accountability in higher education had the appearance of a fad, much like the earlier emphasis on curriculum relevance. Now it is recognized that such pressures are here to stay and are increasing steadily. What does accountability mean? So many flags have been flown on this staff that the question of definition seems increasingly less important. However, accountability in its broadest sense means *responsibile action plus an ability to demonstrate it*.

Some key issues related to accountability flow from this perspective. Fluctuating, stabilizing, or declining enrollments will continue to pose a threat to the survival and/or financial stability of a substantial number of institutions. Available projections reflect widely differing opinions about the future course of enrollments and their key determinants. The demographics of the next decade or two are less debatable. There will be about an 11 percent decline in the number of 18-to-21-year-olds between 1980 and 1985, and another 7-8 percent decline between 1985 and 1990.[1] How much this is a threat for any one institution is unclear, but the general circumstance is that institutions are under pressure to develop contingency retrenchment plans.

The burden of federal legislation and regulations affecting higher education shows little sign of letting up. It constitutes an important operating and capital cost-push factor for which most institutions do not have adequate resources. Even the costs of defending against litigation are prohibitive for many. A related factor is the continuing growth of third-party payment programs, both state and federal. Such programs tend to increase government regulations and administrative

costs. They also can introduce financial burdens for middle income students as institutions raise fees to absorb costs necessitated by compliance with regulations. Third-party payment programs can inflate educational costs as they have inflated health care costs.

Inflation creates pressures for greater productivity and efficiency in higher education. One of the two most sensitive issues concerns the productivity of faculty—who are still too commonly viewed as underworked and overpaid. Another is administrative costs—which have increased in part because of the increasing need to deal with the pressures and demands described above.

The increasing priority given to corrections, health care, and elementary and secondary education puts new pressure on higher education to justify its programs and explain its purposes to the public in understandable terms. Increasing funds for these other social needs tends to reduce discretionary budget allocations, particularly increases for higher education.

The public apparently believes the quality of higher education has eroded seriously. This belief strikes at the heart of the academy, and it is difficult to disprove or substantiate completely. However, declines in standardized test scores, grade inflation, and expanding programs of remedial instruction in colleges and universities are fairly strong circumstantial evidence that something is amiss. While student activism in the late 1960's is often cited as one primary cause of current pressures for accountability, today's students also contribute to this environment in their role as consumers. The states have promoted the concept of the student as consumer by exercising state licensing and authorizing powers to close degree mills, and sometimes to protect enrollments at in-state institutions. The federal government has promoted the consumer concept by supporting higher education through students rather than institutions, and by more and more regulations ostensibly designed to protect federal dollars.

Other contributing factors include aggressive advertising and recruiting efforts by educational institutions, the diminishing economic value of college degrees, faculty collective bargaining structures which limit the role of students in governance, and massive growth in the types of educational opportunities from which students have to choose. One result of these recent developments is that students are exercising their collective muscle in much the same way as other users.

This list does not exhaust the kinds of pressures related to accountability with which institutions seem to be faced. Some institutions are affected more than others. Nevertheless, a majority of campuses (and governing boards and coordinating commissions as well) are giving increased attention to financial and academic planning—as a way of addressing these accountability-related issues. The remainder of this paper describes how institutions are responding or may respond to these issues or pressures and the implications of their responses for accreditation agencies and state governments.

ADMINISTRATIVE RESPONSES

How is higher education responding to increasing pressures for greater accountability? While this question defies simple answers, much can be learned from looking at how institutions are responding to current or anticipated declines in enrollments or financial resources, or both. Unhappily, much of this response is defensive and/or negative in nature.

Procrastination

Procrastination should be mentioned for the record. It typifies "business as usual." There may be several reasons for this non-action. One is that enrollment projections for individual institutions have not been very accurate. Also, administrators often are so engaged with today's problems they cannot devote much time to a "maybe" problem of the future. Some experienced administrators claim that it is better not to cross certain bridges before absolutely necessary. They will point out that alternatives often emerge in the midst of a problem that could not be foreseen before its actual occurrance.

It should be noted that in competing for public funds, the administrator who prunes programs and staff in response to long-range planning may be channeling resources to those who fail to prune likewise. The world of higher education does not consistently reward prudent planners and frugal managers. In the short run, the individual administrator of a single program or institution may fare better by allowing the hard decisions to be made elsewhere, thereby softening his or her "villainous role" image with faculty and fellow administrators.

Procrastination aside, there is no question but that the absolute size of higher education's traditional clientele will decrease. Most states will have to undertake retrenchment planning in some of their institutions. Both states and individual institutions should be moved by someone or some thing from the comfort of procrastination, an environment enhanced by a lack of information and enlarged by institutional self-delusion.

Other Inhibiting Factors

Roderick Groves has identified other but related factors which inhibit retrenchment planning. First, preparation of policies and procedures for possible financial crisis usually is controversial. Such planning may deal with the touchy issue of tenure limitations in which, basically, faculty and administrative interests appear to be at odds. Administrators obviously are not inclined to "invite trouble" by taking on an issue that will surely strain relations with faculty when the matter is seen as neither imminent nor certain.

Second, Groves points out the notion of 'self-inflicted adversity'—that planning for anticipated financial contingencies is risky because it tempts higher authorities to want to reduce budgets immediately, thereby hastening the adversity.

Third, Groves observes that collective bargaining is an additional complicating factor. Universities today basically are leery of policies and procedures that may unnecessarily provoke interest in unionization. Financial exigency, of course, has the earmarks of such a provocation. Since retrenchment frequently has been a subject of collective bargaining negotiations, university administrators can justify foot dragging when changes in personnel policies would have to be included in renegotiations of collective bargaining agreements.[2]

Educational administrators, therefore, have problems similar to those of political leaders who foresee some distant danger due to changing conditions. If either tries to divert funds from current programs to prepare for the coming problem, they upset the status quo. Yet if the problem comes, they are cursed for poor leadership if they did not prepare for it.

Seasoned administrators know that crises open avenues of action which had been closed and that will close again if they are not pursued. So what may be dilatory procrastination to one administrator may to another be an alert scanning for alternatives and careful timing on when to move. Two assumptions of leadership may be too often accepted. They are that individuals can affect circumstances by reason and will; and that the near future can be anticipated clearly enough for advance preparation.

While it may be true that individual farmers or entrepreneurs must scan the foreseeable future and take precautionary action, is that true of individual units within larger systems and bureaucracies? Within large organizations, a single unit may not be affected by larger social or economic trends. More important may be "irrelevant" factors such as system politics and connections. Too often the prudent who tighten their belts only benefit those who play the usual bureaucratic games.

Several years ago in a well known state university, all divisions were told to budget for the coming year only 80 percent of graduate assistantship funds they had for the current year. One administrator, having done as asked, later discovered that the dean of the largest college had hired as many graduate assistants as the college had had the previous year. The dean candidly admitted that he had ignored the directive and dared the administration to fire any of the graduate assistants. The savings of the obedient were swallowed up by the gamesmanship of the truculent.

The bottom line for most administrators, particularly at public institutions, is to avoid shrinkage at all costs, and to get more if at all possible. The president who meekly accepts less may get high marks from the system chancellor as a team player, but he may lose support on his own campus. In like manner, the department chairman may win

points for retrenchment with his provost, but invite trouble with his own faculty. Procrastination in bureaucratized higher education often has more rewards than tightening the belt.

One of the most calculating approaches to retrenchment within a bureaucratized system is to be purposively obtuse. Few system people will want to punish an institution or department for an individual's uncooperativeness. Second, there is always the strong possibility that an institution or department will ultimately gain more from the central coffers by not pruning earlier. Third, an administrator escapes the criticism of expounding a self-fulfilling prophecy; if agile enough, he may even become a spokesman for the problems of institutional distress due to circumstances beyond his control.

DEFENSES AGAINST RETRENCHMENT

Planning against retrenchment is far less painful than planning for retrenchment. It also seems to be higher education's response to date to the threat of declines in enrollment and/or real dollar support.[3] Rather than developing procedures for recognizing and dealing with financial exigency, institutions are taking steps to avoid it. One way to plan against retrenchment is to seek political relief from the financial effects of actual or projected enrollment declines. Little overt planning of this nature is evident. Another way is evident in the growing willingness in higher education to adopt market-oriented, entrepreneurial behavior in an effort to maintain enrollment. Typically, higher education has viewed such practices with disdain, believing in the inherent worth and attractiveness of higher education—a necessity rather than a consumer good—and believing that the academic estate is fundamentally different from other social institutions, especially business and industry.

Higher education, as part of the prevailing social fabric, however, resists both stability and decline and is struggling to avoid both. By identifying new constituencies with compelling instructional and technical assistance needs, higher education is trying to lay the foundation for preventing decline, even assuring growth.

The "planning against retrenchment" strategy seems to be gaining momentum on several related fronts. There appears to be an increasing interest in applying entrepreneurial concepts and theories to higher education, with particular emphasis on ways in which business adapts and innovates to remain competitive. It is gaining legitimacy within the educational community to think of colleges and universities as business organizations.

This line of thought is illustrated by Larry Leslie in "The New Era in Higher Education."[4] Adopting Joseph Schumpeter's *The Theory of*

Economic Development, written in 1934, Leslie suggests that the "businesses" of higher education can innovate in five ways:

- the introduction of a new product or a new grade of product, such as the external degree;
- the introduction of a new method of production, such as variations in the student/professor relationship;
- the opening of new markets, such as those represented by the disadvantaged, women, and those older than traditional college age;
- changes in the source of supply/production factors, such as the progression by private institutions from individual, church and local financial support to state and federal resources, or the reverse progression by public institutions toward the building of private endowment resources;
- reorganization of the business, several businesses, or part of the business, such as the forming of consortia, instituting research units, or even the development of new campuses.

Leslie's argument falls short of suggesting new applications of these strategies for institutions which, for example, already offer external degrees. His basic argument seems to be that higher education innovates and adapts to change in about the same ways as businesses do, although this may not be recognized. The implication is that higher education can continue to innovate and adapt along these lines to minimize "the declines that would otherwise result from cohort size and job market changes alone."[5]

Whether or not educational administrators are comfortable with the idea that their institution is just another big business or that higher education is an industry, they are turning increasingly to marketing as a way of heading off declines in enrollments. The growing emphasis on marketing constitutes a second aspect of the "planning against retrenchment" strategy.

This marketing emphasis is characterized by a direct interest in hiring marketing professionals and adopting marketing techniques aimed at selling education. The college administrator who takes this point of view may regard admissions, alumni relations, development, and public relations as essential marketing functions. Consequently, these functions may be placed under a vice president for resource development—in effect, a vice president for marketing. Behavior of this type has led one informed source, Philip Kotler, to comment that

> "College administrators have been lapping up modern theories of accounting, personnel, and finance as necessary evils . . . And now they're beginning to take notice of marketing. It's still disguised by terms like 'development', but I predict that within five years we will see the position of vice president for marketing in 10-15 percent of our colleges—in substance, if not in name."[6]

As business approaches, particularly those with an emphasis on image development and transmission, are considered in higher educa-

tion, it is inevitable and already somewhat apparent that a darker side of some of these strategies will emerge. Practices which can be questioned include:

- lobbying against tuition and fee increases in the public sector in order to attract and keep larger numbers of students and thus qualify for larger appropriations;
- lobbying for legislation which would permit out-of-state students to enroll in state institutions at in-state rates; this may be done under the guise of promoting diversity, but a desired result may also be the enlargement of service areas and the reduction of price barriers in order to increase enrollment;
- relaxing or abandoning admission, retention, and graduation standards, often under the guise of affirmative action;
- reallocating scarce financial resources which may be needed to strengthen programs in order to beef up recruiting efforts and public relations;
- hiring 'headhunters' on a commission basis;
- giving partial 'scholarships' to large numbers of students in a way that really constitutes a hidden discounting of tuition charges;
- signing blank student visa forms so that recruiters can round up untested, unevaluated foreign students who desire entry into the United States;
- advertising how much credit the institution will give for experiential learning, learning in noncollegiate settings, or by way of College Level Examination Program (CLEP) and other tests;
- lobbying for legislation which protects in-state institutions by making it difficult for even reputable out-of-state institutions to operate in the state; this practice may be coupled with efforts by in-state institutions to establish their own profitable out-of-state operations;
- contracting with entrepreneurs who set up and operate off-campus programs in the name of the institution without adequate oversight;
- entering into agreements with labor unions for apprentice programs or with businesses for training programs so that these activities can be given academic credit, often without adequate oversight by the institution;
- converting Continuing Education Units (CEU's) into academic credits whether on a one-for-one or a formula basis;
- giving course names and numbers to on-campus activities such as senior citizen meetings, square dancing groups, and so on.

In summary, higher education is assuming an increasingly aggressive posture with respect to projected declines in enrollments and/or real dollar support. While institutional responses differ greatly, changes undoubtedly are occuring that lessen the traditional reluctance of educators to think of their institutions as enterprises in which entrepreneurial marketing techniques are inappropriate.

Much of this ought to be regarded as unobjectionable. Higher education institutions have the same basic survival instincts as other social institutions; and competition in education, as in business or industry, is presumably in the public interest. Furthermore, if particular institutions are going to fail, the public interest presumably is served by the demise of those which cannot successfully compete for students.

The authors' basic concerns are that the easy strategies which seem most likely to ensure growth and survival also tend to blur important perceptions of the purposes of higher education, and to raise fundamental questions about the academy's ability to regulate itself. From this perspective it is ironic but clear that higher education, by pursuing survival in inappropriate ways, may undermine its ability to respond to legitimate demands, thus leading to further loss of credibility and autonomy.

PLANNING FOR RETRENCHMENT

Procrastination and planning against retrenchment are objectionable because they bring up questions of maintaining educational dignity. How to maintain or even define educational dignity, however, is clearly a problem. Some specific suggestions can be implied as the antitheses of questionable activities cited in the previous section.

Positive examples include the raising of academic standards at some institutions in the face of declining enrollments, partly in the belief that this may add to the stature of the institution and the employability of graduates in the longer run. Similarly, many institutions are reassessing their programs and activities, and dropping those which were initiated in more affluent years, but which are not essential to current purposes. This has the effect of redirecting resources to essential programs. There are even some efforts to convince legislators to reallocate savings from enrollment declines at state institutions toward specific improvements in quality. Some planners are recommending that legislatures provide financial incentives to encourage voluntary enrollment limitations.

Basic Conditions of Dignity

Whatever specific planning, costing, and budgeting strategies are utilized, certain basic conditions will have to be obtained before most institutions, particularly those in the public sector, can plan for or against retrenchment in the context of maintaining their educational dignity.

Colleges and universities must clarify their educational missions. Too many mission statements fail to consider the intended *consequences* of the institution's educational efforts.[7] Emphasis in mission statements on structure and process produce standards, goals, and plans which are

similarly oriented. Fundamental changes in perceptions of mission are needed to maintain the academy's quality assurance. Institutional accreditation has contributed in subtle but forceful ways to the current shortcomings, but it could also lead to the needed improvements. This will be discussed in a later section.

A second condition of planning *for* retrenchment involves funding mechanisms, particularly in public systems. About one-half of the states use some type of standard formula to generate and/or distribute state general funds for higher education; the other half use a variety of methods, most of which involve incremental budgeting. Whatever the approach, most legislators expect instructional expenditures to be decreased if enrollments decline; and they view the higher education budget as tied to numbers of students. Yet legislators and educational administrators alike have paid little attention to the fact that the manner of funding any social institution can significantly shape its behavior. As argued in a recent paper, funding higher education primarily by number of students seems to cause or reinforce four problems:

> *First*, the emphasis is on quantity rather than quality. Institutions and their constituent programs are rewarded primarily by size and growth with little, if any, tangible reward for limiting size.
>
> *Second*, the typical current policies do not reward institutional recognition of student attainment. Rather, the funding mechanism blindly assumes attainment is being produced. Put another way, the current policies emphasize what higher education probably tends to do least. If a funding policy put more emphasis on recognizing attainment, institutions would probably take more account of where incoming students stand relative to their goals and find the most expeditious ways to move them toward these goals.
>
> *Third*, under most current funding procedures, no clear method exists to relate funding to outcomes—only to activities. As a result, the contemporary concern for accountability creates an insatiable demand for activity data—professors' classroom contact hours, faculty workload studies, and review of low-producing programs.
>
> *Fourth*, the basic problem of funding by numbers is that a mechanical objectivity is prized at the expense of judgment.[8]

Despite these and other problems associated with student-driven funding mechanisms, the consequences of tying funding directly to "quality" or educational outcome may be even more onerous if carried out in ways which directly involve state executives or legislators in making judgments about such matters. Two particular problems are posed by qualitative or outcome-oriented funding approaches:

☐ The prospect that major funders will expect reductions rather than increases or reallocations of funds if an institution or its students are not seen as producing the expected or planned results.

☐ The common prejudice against anything that appears to *reward* public agencies for doing what they ought to do (and presumably are funded to do) anyway.

As states and institutions consider funding mechanisms which give less weight to enrollments, they must do so in ways which reassert rather than undermine the academy's ability to make critical educational judgments.

EMERGENCE OF ACCOUNTABILITY

Earlier sections dealt with social and economic trends and public concerns pressing higher education to be more open about its purposes and standards, and more efficient and effective in its operations. Perhaps the most pronounced pressure is for institutions to face squarely the prospect of leveling or declining enrollments and concomitant lessened fiscal support. Several factors were noted which inhibit administrators, faculty, and others from confronting these realities. It also appears that, given a society in which new markets can be created and old ones revived, the academy increasingly is questioning and challenging the inevitability of such doomsday projections. The situation poses at least two basic dilemmas for higher education:

☐ While contemporary interest in accountability appears to some to offer "a kind of academic salvation through increased efficiency and effectiveness and represent to others a distortion of true academic purposes and functions,"[9] much of the accountability language (efficiency, effectiveness, productivity, performance, measurement) remains difficult to define and apply. There is little evidence that either the critics of accountability or its proponents are making much headway toward solution of this problem.

☐ The entrepreneurial, market-oriented behaviors being employed by the academy as a defense against retrenchment tend to undermine higher education's claim to being different from traditional business and industrial enterprises. The academy cannot strongly, with credibility, assert its traditional autonomy from external oversight by arguing for freedom of academic thought while at the same time giving priority to self-aggrandizing rather than intellectual matters.

Accountability pressures, particularly for public institutions, are likely to persist as long as evaluation and assessment are viewed as integral components of rational decision-making in connection with public policies and programs.

Gestation

The historical antecedents of accountability go back at least to the 1940's and to the systematic development of those techniques and principles of problem-solving variously referred to as policy science,

cost-benefit analysis, operations research, systems analysis, and decision theory.

Lawrence Tribe has provided an insightful account of the gestation of the basic presumptions of current accountability concepts and structures.[10] The first seeds were sown in World War II when physical scientists applied scientific/mathematical approaches known as operations research to military tactical problems. In an effort to keep together some of the research teams and perpetuate operations research after the war, the air force took steps which eventually resulted in the creation of the nonprofit RAND Corporation. Originally RAND research dealt with the mathematical and statistical treatment of tactical decision problems in a fashion similar to operations research during the war, but by the early 1950's was dealing with "problems in which there were no clearly defined objectives to be rigorously maximized." Operations research became systems analysis.[11] While systems analysis does not commit itself wholly to a comprehensive mathematical model, it does try to "apply systematic, common-sense reasoning to the structuring of complex decision situations."[12]

Somewhat concurrently with the RAND shift from operations research to systems analysis, economists were moving toward policy analysis. This was stimulated by Von Neuman's and Morgenstern's *Theory of Games and Economic Behavior* which according to Tribe, demonstrated "how economic modes of reasoning could be applied to seemingly noneconomic problems."[13] The implications of the presupposition were enormous when applied in the federal government in the 1960's. Basically, this approach assumes most human situations can be dealt with "in terms of the traditional economic model of social reality."[14]

To a large extent, according to Tribe, these presuppositions and their resulting techniques aim to transcend value consideration and to remain neutral on world views and ultimate ends. The policy sciences have accepted the extreme value that the other sciences placed on objectivity, that is, "detached, deliberately impersonal, empirically verifiable, and purportedly value-free analysis."[15]

Socialization via the Federal Government

Tribe's central line of argument is pertinent because it illustrates the historical roots of some contemporary modes of analyses. Equally important is Tribe's account of the "socialization" of some of those modes of analyses. This pattern of socialization came about in three complementary ways. The first, as Tribe observed, occurred when the policy sciences were applied to specific problems of the federal government in the 1960's, initially in the Defense Department and later throughout the system. The second was the socialization, including the adoption of the language of policy analysis, in related, and influential, communities. The third may be regarded as the effective adoption of the policy sciences by social scientists.

These and more recent developments have had, and will continue to have, a profound influence on the growth of evaluation as a component of public policies and programs (including federal programs relating to higher education), on the methods and techniques used to evaluate them, and on the ways in which problems are stated. Several observations support this.

Orville Poland says these approaches to evaluation were adopted because of the need to assess the effectiveness of the many, admittedly experimental, programs developed for President Johnson's Great Society effort. Evaluation often was linked to the various programs when they were developed. He also points out that most such evaluations adopt completely the view that a program is to be assessed in terms of its effectiveness and efficiency in reaching its stated objectives. Most evaluators were sociologists or social psychologists, who brought their experimental and research designs to their evaluation tasks. Hence, psychological or sociological research models are now used to evaluate public policy.[16]

The latest developmental stage includes the gradual growth and extension of the language, points of view, and paradigms of the policy sciences to the state level, particularly via the growth of legislative evaluation.

Adoption by State Government

Noting the rapid growth of legislative evaluation (in 1970 no state legislature had a full-time staff responsible for evaluation of program effectiveness; in 1974 there were more than a dozen, with more appearing almost monthly), Chadwin observes that such evaluations go by different names—program auditing, program review, performance post-auditing, legislative oversight, or effectiveness auditing. The purpose of all is to determine if programs are effective.[17]

He points out that legislative program evaluation differs from traditional legislative reviews in three major ways. First, the emphasis is on programs rather than departments, agencies, or bureaus *per se*. Second, program evaluation takes direct account of consequences as well as resources and processes. Third, a great deal more data is collected than is usually the case. At root, program evaluation means having assessable objectives with appropriate means of determining their attainment.[18]

If Chadwin's account of the characteristics of legislative program are somewhat abstract, his account of the more immediate driving forces of these developments is not. These forces include:

- the expanded workloads of legislatures in the 1960s, the subsequent trend toward annual sessions, and the hiring of additional staff;
- the federal decentralization efforts such as the Nixon Administration's "New Federalism" policies and revenue sharing; (one effect of these policies was to transfer certain decision-making

and oversight functions to the states, also adding to the workloads of state legislatures and providing an independent impetus to increase staff and develop information. The changing role of the General Accounting Office was of particular importance in this connection, according to Chadwin, because it began actively to encourage "operational" and "program" auditing in the states.)

- the concurrent heightening of executive tensions at both federal and state levels; and
- the growth of citizen pressures, particularly public interest lobbies such as Common Cause, the Urban Coalition, the League of Women Voters, Ralph Nader's groups, and a host of taxpayer and civic action groups. Because of the experimental character of many social programs in the late 1960's, it is not surprising that the concerns of these groups were highly compatible at the time with the interests of what Chadwin calls "traditional advocates of fiscal responsibility."

> "Despite their different starting points (such) groups ended up asking similar questions: Was this expenditure necessary? Did it achieve its intended objective? Is that objective still valid? How can Big Government be made more accountable?[19]

Finally, Chadwin notes the critical role played by the availability of trained personnel. In particular, the graduate curricula of many programs included instruction in the tools of program evaluation. "A generation of 'social scientists'" was produced in the late 1960s and 1970s who had acquired the tools of program evaluation, along with an interest in domestic rather than foreign affairs. As the traditional academic job market shrank, a number of these graduates readily accepted government jobs where they could apply their skills.[20]

Implications for Higher Education

All of the implications of the growth of legislative program auditing for higher education are not yet clear. But one thing is certain: auditing beyond mere fiscal review is increasing.

The states increasingly will assert both their perceived right and their ability to examine the efficiency and effectiveness of higher education programs and policies. Legislative audits already have occurred in California, Connecticut, Hawaii, Illinois, Kentucky, Massachusetts, New Jersey, New York, Pennsylvania, South Carolina, Virginia, Washington, Wisconsin, and other states. Most have been fairly narrow in scope, dealing with such things as faculty workloads and institutional management. They also have dealt with the management of higher education systems (Virginia) and with state level master planning for higher education (California).

Such legislative audits have had difficulty in establishing legislative intent and organizational or program goals, gathering systematic data, and gaining consensus about qualitative and quantitative measures and performance standards. While these problems have resulted in

modification to some planned audits and have revealed the audit process to be "experimental, fragmented, and incremental," legislative program audits nevertheless tend to be "completed and used as a key part of the legislative process."[21] Despite these difficulties, legislative program auditing has a great deal of momentum. Several factors suggest that higher education generally is not in a good position to deter or forestall it.

The performance auditing field has been plagued by a certain amount of conceptional confusion, and working definitions seem to be emerging slowly. Brown and Pethtel believe that at a working level, there is consensus on the following:

> *Performance Audit*: an evaluation of the effectiveness of governmental operations, programs, and organizations to determine accomplishment of goals and objectives.
>
> *Financial Audit*: a review of financial records and controls to determine whether funds have been legally spent and properly controlled.
>
> *Management Audit*: an evaluation of the efficiency of governmental operations, programs, and organizations, with special attention to administrative policies and practices.[22]

Although legislative program auditing can pose a direct threat to institutional autonomy and academic freedom, the academy's protests to it have sometimes been interpreted as an attempt to cover up something or to avoid any degree of accountability. Legislators have sometimes turned the question around by asking whether institutional autonomy interferes with the effectiveness of higher education.[23]

As Otis Singletary points out, "there is a substantive difference between those things that actually lead to diminished autonomy and those things that are merely distasteful or annoying, and the colleges and universities have not always been willing to face that."[24]

Although legislative performance auditing has its detractors, there is probably as much debate about standards and qualifications *within* the academy as there is between the academy and outsiders. As legislative auditing groups move toward assessments of the effectiveness and quality of academic programs—a logical extension of current efforts—the academy almost certainly will have to clarify its own standards and methods of evaluation if it is going to retain its autonomy.

Summary

Current accountability pressures will persist and grow in the foreseeable future and therefore should be taken seriously. They have a *deep structure* which extends beyond such immediate factors as inflation, student unrest, or declining enrollments. Evaluation and assessment have come to be regarded as integral components of "rational" decision making in our time, and especially in connection with public policies and programs. A source of continuity in these developments has been the role of social scientists and public adminis-

trators dominating various developmental stages. Another source is the federal government. It has been a principal "organizational" driving force. These developments have had a profound effect not only on the growth of evaluation as a component of public policies and programs, but also on the methods used and the ways in which questions and problems are stated.

Pressures for greater accountability in higher education and most social institutions is due in part to the extent to which concerns about effectiveness, efficiency, and quality assurance have become imbedded in the broader social fabric. Yet the very principles, methods, and techniques which permit analysis and response to these concerns clash with the way in which higher education is typically managed.

COUNTERFORCES

The developing social, economic, and political trends outlined earlier create serious conflicts for higher education. The transition from a period of growth to one of stability or decline is creating enormous pressures on institutions to compromise quality for the sake of survival. At the same time, patterns in the broader social fabric portend interest in and scrutiny of the purposes and performance of higher education. The conflicts between these currents are only beginning. They can be expected to occur with increasing intensity and frequency as enrollments stabilize or decline. They also will intensify as legislative and executive agencies become more bold, sophisticated, and practiced at the art of performance and program auditing.

Increased legislative and executive branch control of higher education is a likely outcome. Yet this prospect does not in itself constitute a self-certifying objection to the erosion of higher education's autonomy, at least not from the perspective of state agencies and their staffs. As the academy is prone to forget, legislative and executive branch representatives tend to justify their growing role by citing the apparent inability or unwillingness of the academy to be responsive to their legitimate concerns and questions.

The immediate danger in greater state control is not the spectre of losing essential prerogatives. (The trends cited do not support, in the short term, the spectre of state institutions being organized as branch offices of state government). A greater concern is that increased legislative and executive oversight generally tends to reinforce institutional behaviors which are least needed at this time. Given the historical antecedents and current orientation of modern day legislative auditing, the tendency of such auditors will be to view the world through a lens which, paraphrasing Tribe, does the following:

> *Collapses process into results*—even though the procedures that shape individual and social activity have significance

independent of the final products they generate;

Reduces wholes and blends parts—even though some kinds of problems cannot be reduced to terms that accurately state the structure of the problems;

Anesthetizes moral feeling—even though seemingly detached and neutral concepts and categories often encourage perceptions and criteria of success which are anything but objective; and

Narrows the role of rationality—by unduly separating facts from values, and treating the latter as fixed, even though the whole point of personal or social choice in many situations is not to implement a given system of values in the light of perceived facts, but rather to define and sometimes deliberately reshape the values of the individual or community that is engaged in the process of choosing.[25]

In short, Tribe's description of these tendencies explains the frustration expressed in Otis Singletary's plea that "we not let our passion for counting, weighing, and measuring cause us to either violate sound academic processes or frustrate fundamental academic purpose."[26]

Against this background the critical issue is what will be the counterforce to the following: (1) the increasing pressure *within* the academy to neglect quality in the short term for the sake of survival; (2) the *outside* pressure on the academy to assess performance in ways that seriously distort the essential purposes of higher education.

Some writers argue that contemporary pressures for accountability and other aspects of the changing environment for higher education place a particularly heavy burden on state-level governing or coordinating bodies. This is consistent with the fact that state boards and commissions are in a better position than individual institutions to deal with issues of effectiveness and efficiency and probably less likely than legislative staffs to disregard important academic principles and traditions.

Yet there are at least three reasons to doubt the ability of boards and commissions of higher education to function satisfactorily between the outside audit forces and the concerns of the academy.

The growth of legislative and executive branch intervention in higher education has resulted in part from an alleged lack of leadership or influence in state coordinating or governing boards.

The more power and resources that state boards acquire to meet governmental expectations of them, the more they are alleged to be part of the problem by the institutions. Such boards tread a fine line between advocacy for higher education and a detached oversight. Hence they are kept at arm's length by the institution, typically do not exercise significant academic leadership. This is exacerbated by the fact that the more successful state boards are often led by persons of considerable political skill. They also tend to attract staff who would

be equally at home working for a legislative audit group or for a higher education agency. So the type of leadership and staff in these boards reinforces the campus view of them as just another extension of state bureaucracy.

Most state legislatures have, in effect, traditionally delegated many quality assurance responsibilities to accreditation. Moreover, state boards tend to defer to programmatic accreditation groups (or to consultants who have experience in accreditation visits) for assessments of quality. Such deference, not surprisingly, erodes the image which the board would like to have, namely that of a partner in self-regulation, since it may encourage campuses to view board staff as enforcers of professional judgments which others render.

State boards, therefore, will find it very difficult, if not impossible, to satisfy state government's audit interests and defend the academy's freedoms and values at the same time. While they will continue to be an important interface between the political and academic communities in matters such as budget and program review, other agencies will have to bear some of the burden. These may include institutional accreditation groups, particularly if they can find ways to assure quality more directly than they have in the past.

ACCREDITATION: A NEEDED ALTERNATIVE

Accreditation cannot answer all of the demands imposed upon higher education by the new forms of accountability and the new third party funders. But in the basic matter of quality assurance it has an absolutely vital role. It can be the academy's way of judging itself systematically by explicit criteria. Without accreditation, direct quality assurance by state and federal bureaus is inevitable.

Yet at the very time accreditation is most needed, its future is most uncertain. The six regional accrediting associations may have taken in so many institutions with such different missions and structures that the distinctiveness of these accrediting bodies is lost within the academic community. Furthermore, two of their most fundamental assumptions cannot, in the judgment of many, withstand even cursory examination.

First, they are organized as private associational bodies on the assumption that membership is *voluntary*. For colleges and universities which offer the usual academic degrees, accreditation today is hardly "voluntary" since so much federal money for students and institutional grants and contracts is in large part contingent on accreditation status. Nevertheless, accrediting bodies continue to operate as somewhat private, "voluntary" associations.

An even more serious flaw, in the context of accountability, is accreditation's emphasis on *structure and process*. If institutional

accreditation is to represent some reasonable assurance of educational quality, the criteria or standards employed must have some demonstrable relationship to that quality. Such quality, in one major regard, means that graduates are adjudged as proficient as their degrees signify. Yet the heavy emphasis on structure and process indicates an unawareness of what quality assurance should mean in terms of student achievement. Or it may indicate a definite assumption that if certain academic structures and processes are in place, no direct assessment is needed of educational results.[27]

The flawed nature of these two assumptions is made vivid by the emergence of nontraditional forms of higher education. In a recent national study, it was found that visiting team reports almost never deal with results.[28] That is, they do not examine assessments of actual student achievement against the general meaning of various degrees.[29]

Perhaps nothing has more fundamentally tested institutional accreditation's two basic assumptions than the nontraditional movement. On one hand the nontraditionalists, in many cases, often are not a part of the collegiality that reflects the private, associational nature of accreditation. On the other, they tend to disregard structures, procedures, and processes long thought essential to quality outcomes and to seek the more direct and less costly paths to certain objectives.

Few, if any, of the nontraditional practices are questionable in and of themselves. Indeed, many of them have been used in minor ways within established institutions for some time. But as these minor deviations from traditional practice become dominant practices within an institution, they pose a fundamental threat to the traditional academy. By their very existence, they question what many see as the unnecessarily cumbersome and complex nature of the traditional institution of higher education. Just as the freestanding research and policy institutes have assumed one of the major purposes of the university and pursue it single-mindedly, so the nontraditional institutions often adopt certification for degrees and/or instruction as a single mission.

The nontraditional movement challenges accreditation in the following ways:

☐ It stretches still further accreditation's already strained fabric of collegiality.

☐ It makes more clear accreditation's dilemma in being at once the primary agent for federal eligibility and a private, associational enterprise.

☐ By precedent, the accreditation of nontraditional institutions contradicts the structural/process contracts with traditional institutions on such things as full-time, highly credentialed faculties and elaborate libraries, when the nontraditional institution may have no full-time faculty or library of its own, or no physical facilities beyond rented office space.

☐ Finally, it lessens the delicate catholicity of the university as an institution of several major institutional missions—teaching, service,

cultural preservation, community of scholars, research, credentialling, and socialization. When an organization becomes accredited as an institution of higher education with only one or two of these purposes, this intertwined nexus of roles is basically questioned. Wang sees the evolution of "unbundling" in higher education beginning in part with nontraditional efforts.[30]

Now higher education is no longer accountable just to itself—its own community of similar institutions—but it is also accountable to its major third party funders, state and federal government. Higher education is now being pressed to account for itself in nonacademic terms—cost-effectiveness, quality control and compliance and program audits—to these third party funders. The forms of accountability traced earlier in this paper are rooted in certain presuppositions:

> The purposes of any worthy undertaking can be translated into explicit, quantifiable objectives.
>
> There is a direct and determinable relationship between process and product such that process can be directly modified in terms of its measurable effect on the product.
>
> There is no intrinsic worth to a given process or structure; its value lies only in its effectiveness and efficiency in producing desired outcome.
>
> Numbers are the ultimate in representing reality; subjective, even consensual, judgments are allowable only until valid and reliable techniques can be developed to yield numbers in their place.

Beyond simple incursion into the academic estate by government bureaucrats, there is now a deeper structural intrusion. It is that the academy must continually justify itself by procedures that rest upon the four presuppositions above. Any resistance of the academy to these procedures is often read by the technocrats and bureaucrats as "feathers on the mouth" of the chicken thief.

It is not, in many cases, that members of the academy disagree with the larger goals of the management experts, efficiency auditors, or compliance checkers. Rather they are profoundly concerned about these two matters:

> The more often the academy acquiesces to the outside reviewer ("outside" the academy), the more it is consenting to direct external manipulation rather than academic self-regulation.
>
> By being forced to adopt the accountability presuppositions and paradigms of industry and government, the academy is being forced to speak *their* language and lose its own through nonuse.

So the invader not only has his way with higher education, but by changing its language—its referents—he brings higher education into his own world view. A question arises as to whether the academy is a lingering reactionary vestige of a pretechnological culture, or a link with values that will survive in a technological era. Accountability

paradigms and techniques are capable of being used by government with respect to higher education so that the academy's separateness from the political estate is more rhetoric than reality. At the same time, a careful appropriation by the academy of these techniques to academic decision-making can improve the effectiveness and efficiency of the academy. At root is the fundamental question: Is the academy, public and private, with such massive governmental funding (direct and indirect, state and federal) destined to become purely an extension of government?

The American Council on Education and the Council on Post-secondary Accreditation advocate "self-regulation" for the academy in order to preserve and enhance the separateness of the academy from the state. There are ideologues on various issues who would use the power of the purse and concomitant regulation to intervene directly in the academy's affairs. It appears to make no difference to them that they are developing precedents that ideologues of opposite persuasions may one day use to work their wills directly on the academy.

Independence may be more subtly but as effectively eroded by unthinking adoption of the accountability techniques previously discussed. So if "self-regulation" is to protect the academic territory, it should make internal criticism predominant over quantification for external uses. Bowen in a recent paper dealt with the limits of quantification and the value of "criticism." He wrote:

> "There is no way to side-step intuitive judgment and criticism, with all the pitfalls they entail.
>
> "It would be foolish to suppose that educational outcomes could be readily quantified and the processes of judgment and criticism could be wholly dispensed with.
>
> "As Cardinal Nejwman observed: A university is an Alma Mater, knowing her children one by one, not a foundry, or a mint, or a treadmill."[11]

In addition to questioning quantification, Bowen provided a substantial explanation of criticism.

> "It is a fact that cherished values are not readily suspectible to precise measurement. Friendship, love, beauty, honor, patriotism, and fairness are *assessed by means of an art that is based upon intuitive judgement. When such intuitive judgement is formalized and institutionalized, it is called criticism.* Our powers of criticism are developed in proportion to our sensitivity, and critical judgements usually are based upon *standards derived from tradition. The influential critic is a person who has keen sensitivity coupled with knowledge of traditional standards* and who is thus able to reach judgements that gain wide acceptance, i.e. the art critic, the social critic, and *the educational critic.*" (Emphasis added)[12]

Accreditation's role in self-regulation seems to be self-evident: Private accreditation is a formal systematic way for the academy to regulate itself by educational criticism—possibly the only institutional

means of implementing self-regulation. But it will not be enough for accreditation to simply declare the virtues of self-regulation. Even if by some powerful, quick stroke it could recapture the regulatory ground already lost to government, it would still face basic difficulties, because the current problem of regulation is not simply territorial; it is a problem of fundamental policies and basic operational procedures.

Institutional accreditation's working assumptions are questionable as a theoretical base on which to build healthy *educational criticism.* The assumption on which most of accreditation practice appears to rest is that forms, processes, and structures are adequate to assure quality of results so that direct checks on results are not necessary. This assumption has been widely discussed and questioned. There are indications that the accrediting community is becoming sensitive to the debate. The accrediting community needs to commit itself to developing the art of educational criticism, taking results into account. One general paradigm for a criticism of educational results might be: Are the achievements of graduates commensurate with the degrees they were awarded?

Educational criticism in the context of accreditation could be one group of academics making judgments of their colleagues' academic judgments of their students' performances and products. With attention to the general meaning of degrees offered by the institution, the stated mission of the institution, and their own experience, visiting teams could critique an institution in terms of available evidence of student achievement such as examinations, student projects, theses, and dissertations.

Discussions about educational outcomes often have overemphasized nationally standardized tests and sociological, follow-up, impact studies. Other useful instruments are available from the major testing agencies. Elaborate follow-up studies of graduates are informative. Activity and attitude inventories are helpful in determining campus impact over time. Nevertheless, the accrediting community should not wait until someone develops the complete institutional assessment system before attempting to make judgments about educational results.

Accreditation teams might begin now to look for evidences of student achievement used for the award of credit and degrees and make judgments about the quality of the institution in light of adjudged student achievement compared with degrees awarded.

If self-regulation is to become more than defensive rhetoric, accreditation will have to develop better ways to assure institutional quality. If the primary indicator of quality is a critical judgment of student achievement compared with the general meaning of respective academic degrees, the work of the Task Force on Educational Credit and Credentials of the American Council on Education has provided a basis for establishing general meaning for academic credentials.[33]

The reassertion of concern for educational quality through educational criticism will not satisfy all of the accountability concerns

expressed earlier in this paper, but it will help. The expansion of entrepreneural institutions will be checked by fair but rigorous accreditation judgments of graduates' achievements prior to award of degrees. A focus on educational results provides a better foundation for assessing the effectiveness and efficiency of instructional activities and curricular arrangements of all institutions. These judgments would then follow from peer appraisal of educational results rather than imposing the managerial and efficiency assessments of industry on the distinctive functions of the academy.

While various branches of government appear to be growing less enthusiastic about elaborate systems approaches to management and accountability, the academy appears about to adopt kindred techniques for its own management and accountability. Rather than trying to imitate the appearance of technocratic reliability, the academy should reaffirm its own traditions of excellence and buttress them where appropriate with current managerial, audit, and psychometric techniques. It must not, in the name of accountability, succumb to the belief that numbers and systems are paramount over criticism and judgment. Critical judgment is probably more grown than designed; it grows best from a soil of tradition and collegiality.

The major tasks before accreditation appear to be as follows:

☐ Develop quality assurance procedures that build upon basic academic values rather than fundamentally assaulting them.

☐ Develop accreditation procedures that deal with structure and process so as to assure probity or integrity of operation within institutions without constant external oversight.

☐ Encourage a number of academic people to become competent and recognized educational critics and insure that such people have key roles on visiting teams.

The need for private accreditation is great. Given the diversity present in institutional accreditation, it will be difficult for accrediting associations to pull themselves together for a direct, coherent approach to quality assurance. Overcoming this basic difficulty will depend to some extent on how willing premier institutions are to lend their influence and expertise to strengthening regional accreditation. Member institutions must commit the financial resources for stronger accrediting agency staffs and also for the research and development necessary to improve the art of educational criticism and to educate individual critics. Governmental officials with their vast regulatory and purse powers must be willing to allow quality assurance procedures indigenous to the academic estate rather than imposing their own accountability procedures. Finally, institutions should not ape non-academic strategies in attempts to forestall an enrollment decline; to do so will only encourage demands for nonacademic accountability procedures.

To a hungry man a mess of potage is powerfully appealing.

NOTES

[1]For an overview of recent enrollment and population projections, see The Carnegie Foundation for the Advancement of Teaching, *More Than Survival* (San Francisco: Jossey-Bass, 1975), Chapters 4 and 5.

[2]Roderick T. Groves, "Guidelines for Emergency," *AGB Reports*, May/June 1977, P. 40.

[3]Increases in real dollar support are increases over and above those needed to offset the affects of inflation.

[4]Larry L. Leslie, "The New Era in Higher Education," *Business Officer*, February, 1978, p. 17.

[5]Ibid.

[6]"Hard-Hit Schools Turn to Marketers," *New York Times*, January 22, 1978, p. 1.

[7]This is emphasized in a recent report of the Carnegie Foundation, which also exhorts institutions to "avoid the sales rhetoric often encountered in the introductions to college catalogs and recruiting brochures." The Carnegie Foundation for the Advancement of Teaching, *Missions of the College Curriculum* (San Francisco: Jossey-Bass, Inc., 1977) p. 151.

[8]John Harris, "Program Evaluation Funding: An Alternative to Funding Public Higher Education by Number of Students," *Southern Journal of Public Administration*, Vol. 1, No. 3 (December 1977), pp. 322-24.

[9]Otis Singletary, "Accountability and Higher Education," *Efficiency and Effectiveness in Higher Education: Proceedings of 24th Legislative Work Conference* (Atlanta: Southern Regional Education Board, 1975) p. 4.

[10]Lawrence Tribe, "Policy Science: Analysis or Ideology?" Philosophy and Public Affairs, Fall, 1972.

[11]Ibid., p. 68.

[12]Ibid.

[13]Ibid.

[14]Ibid.

[15]Ibid, pp. 75-77.

[16]Orville Poland, "Program Evaluation and Administrative Theory," *Public Administration Review*, July/August 1974, p. 333.

[17]Mark Lincoln Chadwin, "Introduction-The Nature of Legislative Program Evaluation," *Legislative Program Evaluation in the States: Four Case Studies* (New Brunswick: Eagleton Institute of Politics, 1974), p. 1.

[18]Ibid., p. 2.

[19]Ibid.

[20]Ibid.

[21]Richard Brown and Raymond D. Pethtel, "A Matter of Facts: State Legislative Performance Auditing," *Public Administration Review*, July/August 1974, p. 321.

[22]Ibid., p. 319.

[23]See Senator Frederick T. Gray "A Closer Look at Legislative Concerns About Higher Education," *Efficiency and Effectiveness in Higher Education*, Southern Regional Education Board, 1975, p. 2.

[24]Otis Singletary, *Efficiency and Effectiveness*, p. 6.

[25]Lawrence Tribe, pp. 79-105.

[26]Otis Singletary, p. 9.

[27]This issue was put into useful perspective by William Troutt in his dissertation, "The Quality Assurance Function of Regional Accreditation," George Peabody College for Teachers, August, 1978.

[28]*Assessing Nontraditional Education: Summary Report and Research Reports: Seven Reports of the Project to Develop Evaluative Criteria and Procedures for the Accreditation of Nontraditional Education*, Volumes 1 and 2. The Council on Postsecondary Accreditation, September 1978.

[29]John Harris, "Institutional Accreditation and Nontraditional Undergraduate Educational Institutions and Programs" (Report No. 3), *Research Reports: Seven Reports*, op. cit., p. 55.

[30]William K.S. Wang, "The Unbundling of Higher Education," *Duke Law Journal*, Vol. 73, 1975, pp. 58-72.

[31]Howard R. Bowen, "Goals, Outcomes, and Academic Evaluation," in Alexander W. Astin, Howard R. Bowen, and Charles M. Chambers, *Evaluating Educational Quality: A Conference Summary*. An Occasional Paper of The Council on Postsecondary Accreditation, 1979, p. 21.

[32]Ibid.

[33]*Recommendations On Credentialing Educational Accomplishment* by the Task Force On Educational Credit And Credentials. Washington: American Council on Education, 1978.